

Respectfully submitted,

**SOUTHWESTERN BELL TELEPHONE COMPANY**

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November 17, 1995

## SOUTHWESTERN BELL TELEPHONE COMPANY

### VDT THRESHOLD CALCULATION EXAMPLE

As a hypothetical example, the following assumptions and resultant calculation illustrates the method being proposed:

#### STEP 1

- *Total Number of households passed by VDT system deployment in all wire centers = 50,000*

Total number of households passed by each VDT system is one of the items of information that the Commission is requiring in the VDT Quarterly Report 43-09A as indicated in Paragraph 41 of the Memorandum Opinion and Order adopted September 29, 1995 (Reporting Requirements on Video Dialtone Costs and Jurisdictional Separations for Local Exchange Carriers Offering Video Dialtone Services, DA 95-2026, AAD 95-59).

#### STEP 2

- *Total number of Working Loops in the Study Area = 8,000,000*

Total Number of Working Loops is obtained from Line 1270 of the FCC Report 43-04 ARMIS Access Report. Line 1270 is defined on page 15 of 66 of the Column Descriptions attached to the Order adopted February 4, 1991 and released February 13, 1991, In the Matter of Revisions of ARMIS Report 43-04 (The Access Report).

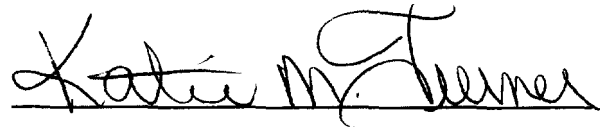
#### STEP 3

CALCULATION:      Number of households passed by VDT in the Study Area  
                              divided by  
                              Total Working Loops in the Study Area  
                               $50,000 / 8,000,000 = .00625 * 100 = .6\%$

Given that the result derived from the above example falls below the 5% benchmark being proposed by SWBT, the *de minimis* threshold is not met. This illustrates an insignificant level of VDT deployment within a study area that would be well below the threshold requirement.

**CERTIFICATE OF SERVICE**

I, Katie M. Turner, hereby certify that the foregoing, "Opposition of SWBT" in Docket No. 94-1, has been filed this 11th day of December, 1995 to the Parties of Record.

A handwritten signature in cursive script, reading "Katie M. Turner", is written over a horizontal line.

Katie M. Turner

December 11, 1995

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